

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**CAN'T STOP PRODUCTIONS, INC.,**

**Plaintiff,**

**-against-**

**SIXUVUS, LTD., ERIC ANZALONE,  
ALEXANDER BRILEY, FELIPE ROSE,  
JAMES F. NEWMAN, RAYMOND SIMPSON,  
and WILLIAM WHITEFIELD,  
Defendants,**

**7:17-cv-06513-CS**

**DECLARATION OF KAREN L.  
WILLIS IN SUPPORT OF NEWLY  
DISCOVERED FACTS IN  
OPPOSITION TO MOTION TO  
ENFORCE THE SETTLEMENT**

**KAREN L. WILLIS dba HARLEM WEST  
ENTERTAINMENT**

**Intervenor.**

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I, Karen L. Willis, under penalty of perjury, swears to the truth of the following statements:

1. I, Karen L. Willis, doing business as Harlem West Entertainment, am the Intervenor in this action and make this declaration in support of newly discovered facts which weigh heavily against the alleged settlement agreement being enforced because a material party to the agreement can no longer fulfill his obligation with the Kings of Disco therefore the alleged settlement agreement is now void and/or avoidable. Notwithstanding this declaration, the court lack jurisdiction to hear defendants motion to enforce the settlement agreement.

2. Exhibit A is a true and correct copy of information obtained from the Sixuvus Kings of Disco Facebook page.

3. On May 16, 2018, Felipe Rose made declaration to the court that he will “abide by the terms of the settlement agreement personally.” See declaration of Felipe Rose. However, the settlement agreement is not solely a personal settlement between Mr. Rose, the Sixuvus, Ltd, Can’t Stop and Intervenor, but an agreement, most importantly, between the Sixuvus, Ltd., Can’t Stop Productions, and Intervenor, with Mr. Rose being afforded certain rights as a member of the “Kings of Disco,” not as a individual. Mr. Rose admits to not-only, no-longer being a member of the Kings of Disco, but he admits to no longer being a legal member of the Sixuvus, Ltd., organization.

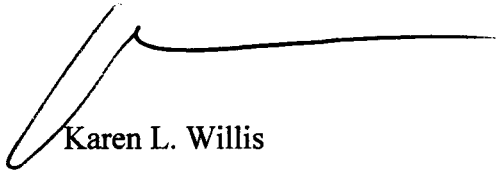
4. Therefore, Mr. Rose is not in the position to abide by the terms of the settlement because he’s a material part of an agreement where certain rights flow to him (and only him) as a member of the “Kings of Disco” and the Sixuvus, Ltd. Now that Mr. Rose has divorced himself from the Kings of Disco and Sixuvus, Ltd., he’s no longer in the position to abide by the terms of

the agreement as related to his performance with the Kings of Disco fully dressed a Native American. Mr. Rose can no longer fulfill this aspect of the settlement.

5. In fact, the Sixuvus has already removed Mr. Rose from their Facebook page and replaced Mr. Rose with another entertainer by the name of Raymond Rodriguez in the role of the Native American. Interestingly, the Sixuvus seems to have photo shopped in Mr. Rodriguez face over Mr. Rose's body. See Exhibit A, The Sixuvus, Ltd., publicly list Mr. Rodriguez as joining the Kings of Disco in 2018. As such, a material change has occurred, and the agreement is therefore voidable as a direct result of this change.

6. Accordingly, a material party to the settlement cannot be joined for purposes carrying out his performance with the Kings of Disco dressed in full native gear.

Sworn Under Penalty of Perjury.



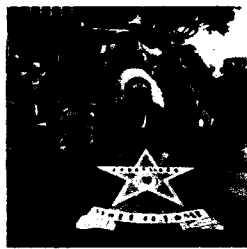
Karen L. Willis

July 16, 2018

# EXHIBIT A



Kings Of Disco



Kings Of Disco

@OfficialKingsOfDisco

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## About

## INTERESTS

## Artists We Also Like

KC &amp; The Sunshine Band, Gloria Gaynor, The Ritchie Family

## Band Interests

Disco Music and Partying Like Its 1977!

## CONTACT INFO

Call 212-904-1626

sixuvusltd@aol.com

## MORE INFO

## Genre

Disco/Dance/Pop

## Band Members

Alex Briley - Soldier (Original)  
Ray Simpson - Cop (Joined 1979)  
Eric Anzalone - Biker (Joined 1995)  
Jim Newman - Cowboy (Joined 2013)  
Bill Whitefield - Construction Worker (Joined 2013)  
Raymond Rodriguez - Native American (Joined in 2008)

## Hometown

New York, NY USA

## Biography

Kings Of Disco. We are all former members of the group Village People that have toured for over 30 years as The Village People. We have performed high energy shows all over the world.  
\*All Village People Photos On This Page Are Historical\*

## Current Location

New York, NY

## General Manager

Sixuvus, Ltd. - New York, NY (212) 904-1626

## Press contact

Deborah Crawford- sixuvusltd@aol.com

Musician · Musician/Band

- Sheila Vernon Evans
- Donald Robinson
- Renee Winston
- Gloria Caldwell-Ott
- Pasquel Buchanan 2h
- Heé Vicio 2h
- Julio Gonzalez 2h
- Montana Tyler 5h
- Shilpa Tummala 2h
- Delka Nenkova
- Trev Moore 57m
- Col Mike Tyler 5h

## GROUP CONVERSATIONS

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